SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688
(510) 464-6000

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VIA EMAIL and U.S. MAIL

Mr. Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: BART Comments on *Preliminary Evaluation of Alternative Methods of Transportation Analysis*

Dear Mr. Calfee:

The San Francisco Bay Area Rapid Transit District (BART) is pleased to respond to your office's solicitation for input on *Preliminary Evaluation of Alternative Methods of Transportation Analysis*. Our comments respond to the suggestions provided in your letter of December 30, 2013. BART is also sending comments on *Possible Topics to be Addressed in the 2014 CEQA Guidelines Update* under separate cover.

BART is a rapid transit district providing rail service in San Francisco, Alameda, Contra Costa, and San Mateo counties. BART owns and operates 44 transit stations, the majority of which serve urban neighborhoods. Four new stations in eastern Contra Costa County and Alameda County are currently planned or under construction. New BART extensions and other BART improvement projects benefit the environment by shifting commuters from thousands of cars to BART's fleet of 669 electric-powered railcars, reducing air pollutant and greenhouse gas emissions, traffic congestion and energy consumption.[1] BART's projects are subject to the requirements of CEQA review.

SB 743 requires the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts within transit priority areas, as defined in the statute. OPR further has discretion to develop alternative criteria for areas that are not served by transit, if appropriate. BART supports these efforts to change the focus of transportation impact analysis from vehicle delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of mixes of land uses, and supports efforts to find alternative metrics to LOS to measure transportation

[1] BART's average weekday ridership exceeded 392,000 riders in fiscal year 2013.

impacts. BART's overall strategic vision of being "a high-quality transit service that supports a sustainable region" is in alignment with these efforts.[2]

BART has operated, developed, and improved transit in the San Francisco Bay Area for more than 40 years. During this time, we have also undertaken numerous CEQA reviews and commented on many others. With this experience, BART reviewed OPR's preliminary evaluation of six alternatives. BART supports four of the six measures, with qualifications and modifications. The four are Vehicle Miles Traveled (variant 1), Fuel Use, Motor Vehicle Hours Traveled (with modification), and Presumption of Less Than Significant Transportation Impact Based on Location. Our qualifications and modifications are described below. BART also proposes an additional measure for OPR's consideration, also described below.

I. Guiding Principles

BART developed four principles to help guide its evaluation of alternative measures to LOS. We believe following these four principles will help develop measures that support OPR's SB 743 statutory directive to "promote the reduction of greenhouse gas emissions, the development of multimodal networks, and a diversity of land uses."

1. ***Promote transit ridership.*** Increasing transit ridership over automobile usage supports the statutory goals of SB 743. Today, transportation networks are to large extent auto-centric and monomodal. To develop multimodal networks, BART believes developing measures promoting non-automobile travel modes are needed to shift past preferences from the automobile to other modes. Projects that promote transit ridership should be encouraged. Projects that reduce transit ridership should be discouraged.
2. ***Maintain or improve transit service performance.*** BART has a goal to "maintain and strategically enhance BART service."[2] Enhancing service performance (i.e., transit speed, reliability, frequency or access) supports increasing transit usage and therefore supports the statutory goals of SB 743. Hence, projects that maintain or enhance transit service performance should be encouraged. Some projects may include physical modifications that degrade transit service performance (i.e., reduced transit speed, reliability, frequency, access). These projects should proceed only with careful consideration or mitigation of their impacts on transit. This principle is particularly important because local impacts on transit service performance rarely remain local. A project at a specific location can degrade transit performance across an entire transit network (i.e., reducing transit speed at a particular location affects all transit services passing through that location).
3. ***Encourage development near transit stations.*** One of BART's strategies is to "work with community partners to maximize support for transit-oriented development."[2] Development near transit stations generally supports reducing greenhouse gas emissions, creating multimodal networks, and promoting mixes of land uses. Therefore, projects that focus development around transit stations should generally be encouraged. However, not all transit-adjacent developments promote transit, as not all developers choose to develop in ways complementary to transit or greater mixed-use. Therefore, encouragement of development near transit stations should be tempered by a recognition that mere proximity to transit does not equate to uses complementary to transit.

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[2] BART Strategic Plan, October 2008.

4. ***Encourage alternative modes of access to transit.*** BART has a goal to "facilitate multimodal access including transit, bicycling and walking."[2] Using alternative modes to access transit other than driving supports reducing greenhouse gas emissions, creating multimodal networks, and promoting mixes of land uses. Therefore, projects that promote using alternative modes to access transit should generally be encouraged. However, alternative mode projects may not always be developed in collaboration with transit agencies to ensure a complementary multimodal network. Therefore, special consideration should be given to projects that promote using alternative modes and do so in a complementary manner to transit.

II. Comments on Alternative Measures

BART supports four of the six measures evaluated by OPR in Section VII of *Preliminary Evaluation of Alternative Methods of Transportation Analysis*, with qualifications and modifications. The four are Vehicle Miles Traveled (variant 1), Fuel Use, Motor Vehicle Hours Traveled (with modification), and Presumption of Less Than Significant Transportation Impact Based on Location. BART would support advancing any one or more of these four measures. Our qualifications are described below.

Vehicle Miles Traveled

BART supports this measure. Projects that promote transit ridership, encourage development near transit stations, and encourage alternative modes of access to transit will generally reduce vehicle miles traveled. Thus the Vehicle Miles Traveled measure supports principles 1, 3 and 4.

OPR is considering two variants of the Vehicle Miles Traveled measure. The first variant would calculate Vehicle Miles Traveled on a per capita basis for residential, per employee for employment centers, and per trip for commercial. The second variant would calculate Vehicle Miles Traveled on a per person-trip basis. BART supports variant 1, and has concerns with variant 2. Our concern is that the second variant would encourage several short trips rather than one long trip. For example, consider two different development patterns: 1) school, employment and shopping are in different locations, each two miles from a resident's home; 2) school, employment and shopping are co-located, three miles from a resident's home. With the former pattern, the residents makes three separate round trips, one to drop off their children at school, a second to commute to work, and a third to complete shopping errands. Though the distance per trip is only two miles, the total amount of travel is 12 miles. With the latter pattern, the resident makes one round trip to complete all three tasks. The distance per trip is longer – three miles – but the total amount of travel is less – six miles. Clearly the latter pattern is preferred. Because of this, BART supports calculating vehicles miles traveled on a basis other than per person-trip.

Automobile Trips Generated

BART agrees with OPR that this measure is deficient in that it does not account for the length of trips. We do not support this measure.

Multi-Modal Level of Service

BART agrees with OPR that this measure is deficient in that it only accounts for local effects in the vicinity of a proposed project. BART agrees that this measure might have the unintended effect of discouraging infill development, as well as being more difficult to calculate than LOS. In addition, development of this measure would require careful consideration of the proper weights to apply to different modes, which may in turn vary by region. Therefore, we do not support this measure.

Fuel Use

BART supports this measure. Projects that promote transit ridership, encourage development near transit stations, and encourage alternative modes of access to transit will generally reduce fuel usage. Thus the Fuel Use measure supports principles 1, 3 and 4.

Motor Vehicle Hours Traveled

BART supports a modified version of this measure. Projects that promote transit ridership, encourage development near transit stations, and encourage alternative modes of access to transit will generally reduce motor vehicle hours traveled. Thus the Motor Vehicle Hours Traveled measure supports principles 1, 3 and 4.

BART believes, however, that this measure should be modified to Person Hours Traveled. This modification would then measure delay to people, which is more relevant than delay to vehicles. For example, Person Hours Traveled properly considers delaying one transit vehicle carrying 10 people by 10 minutes as ten times more onerous than delaying one personal automobile carrying 1 person by 10 minutes.

Presumption of Less Than Significant Transportation Impact Based on Location

One of the options that OPR is considering is a presumption that development projects in "transportation-beneficial development" areas have less than significant regional transportation impacts. BART supports this measure in principle because it encourages development in centrally-located areas and areas served by transit. The concept of transportation-beneficial development areas is consistent with the "Transit Priority Areas" defined in SB 743, as well as the Transit Priority Project Areas introduced in SB 375 (Sustainable Communities and Climate Protection Act of 2008).

BART is, however, concerned about simply presuming less than significant transportation impacts for all developments proposed in transportation-beneficial development areas. While in general developments in such areas have relatively less impact on the transportation system, a specific development or specific components of a development might have significant adverse impacts that need to be evaluated, disclosed and mitigated. For example, a development project that impedes the primary existing pedestrian and bicycle access to a transit station might have a significant negative impact on transit that might outweigh the benefit of being located in a transportation-beneficial development area. Another example is a development project that causes several bus lines to be rerouted to a longer alignment. A third example is a development project not conducive to transit usage (e.g., auto repair shops, self-storage facilities).

Because of these concerns, BART supports presuming development projects in transportation-beneficial development areas have less than significant regional transportation impacts, but subject to the following conditions: 1) the project supports transit usage and is consistent with the region's Sustainable Communities Strategy (SCS); 2) the project does not include physical modifications to transportation infrastructure that significantly degrade existing transit service performance; and 3) the project does not significantly degrade access to the existing transit system.

III. Proposed Additional Measure: Transit Performance Impacts

The Vehicles Miles of Travel, Fuel Usage, and Motor Vehicle Hours Traveled measures support principles 1, 3 and 4. None of them, however, support principle 2 because they do not account for the potential negative effect on existing transit riders of degradations to transit service performance. Accordingly, BART proposes that OPR consider an additional measure, Transit Performance Impacts (TPI) addressing transit impacts.

Projects that include physical modifications to transportation infrastructure that reduce transit speed, reliability, frequency or access worsen the transit experience for existing transit riders. These are negative impacts to the transit system that should be accounted for and are not directly measured by reductions in vehicle miles traveled, fuel usage, or motor vehicle hours traveled. Moreover, impacts to the transit system can have the unintended consequence of diverting riders to automobiles, undercutting efforts to reduce vehicle miles traveled, fuel usage, and motor vehicle hours traveled. An example is a development project that removes transit priority treatments (e.g., dedicated transit way, transit signal priority, etc.), causing existing transit users to experience longer travel times. Another example is a project that blocks a walk access route to a transit station, causing existing transit users to walk further to reach their station.

To rectify this issue, BART recommends advancing an additional measure, TPI, to capture the potential negative effects a project's physical modifications to transportation infrastructure might have on transit performance. TPI could be measured by person hours traveled by existing transit riders or by other metrics. More consideration of how to effectively measure TPI to support the objectives of SB 743 will be needed.

IV. Comments on Mitigation Measures

OPR lists several possible mitigation measures that could be utilized to reduce Vehicle Miles Traveled, Fuel Usage, and Motor Vehicle Hours Traveled. These include designing projects with a mix of uses, building transportation demand management (TDM) features into a project, locating projects in neighborhoods that have transit or active mode transportation opportunities, or contributing to the creation of such opportunities.

BART suggests that another possible mitigation measure is providing funding into an account used to improve access to transit stations, modeled on the mitigation fees now utilized by many lead agencies to mitigate transportation impacts measured by LOS. Examples of improvements that could be funded include enhancing pedestrian and bicycle access, or providing shuttle or express bus connections. Should a project have adverse impacts on transit service performance, a possible mitigation would be providing funding into an account used to implement transit projects to address performance issues.

In conclusion, we respectfully request that OPR consider BART's recommendations and welcome the opportunity to continue the dialogue. If you would like to discuss further or require more information, please contact Andrew Tang, BART Principal Planner, at (510) 874-7327 or atang@bart.gov.

Sincerely,

Val Menotti
Manager, Strategic and Policy Planning

CC: R. Powers
R. Mitroff
J. Ordway
P. Fadelli
M. Wu-Morri